IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS CORPUS CHRISTI DIVISION

M.D., by her next friend, Sarah R.	§	
Stukenberg, et al.,	§	
	§	
Plaintiffs,	§	
	§	
VS.	§	CIVIL ACTION NO. 2:11-CV-00084
	§	
GREG ABBOTT, in his official capacity	§	
as Governor of the State of Texas, et al.,	§	
	§	
Defendants.	§	
·	-	

DEFENDANTS' NOTICE OF SUPPLEMENTAL DECLARATION RELATED TO CERTIFICATION OF COMPLIANCE REGARDING REMEDIAL ORDER NOS. 2, 3, 5, 7, 10, 25-27, 29, 31, 37, AND B-5

Defendants Greg Abbott, in his official capacity as Governor of the State of Texas, Cecile Erwin Young, in her official capacity as Executive Commissioner of the Health and Human Services Commission of the State of Texas, and Jaime Masters, in her official capacity as Commissioner of Department of Family and Protective Services of the State of Texas ("Defendants"), filed their certification of compliance regarding Remedial Order Nos. 2, 3, 5, 7, 10, 25-27, 29, 31, 37, and B-5 on January 16, 2021 [Dkt. 1021]. Attached as Exhibit F to that certification was the sworn declaration of Clint Cox ("Declaration"). Defendants hereby submit Mr. Cox's supplemental declaration to correct information contained in Paragraph 71 of his Declaration.

Respectfully submitted.

KEN PAXTON Attorney General of Texas

BRENT WEBSTER First Assistant Attorney General

GRANT DORFMAN
Deputy First Assistant Attorney General

SHAWN COWLES
Deputy Attorney General for Civil Litigation

THOMAS A. ALBRIGHT Chief, General Litigation Division

/s/ Kimberly Gdula CHRISTOPHER D. HILTON Assistant Attorney General Texas Bar No. 24087727 Southern District No. 3029796 KIMBERLY GDULA Assistant Attorney General Texas Bar No. 24052209 Southern District No. 10092074

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ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF SERVICE

I hereby certify that on January 28, 2021, a true and correct copy of the foregoing document has been filed in accordance with the Electronic Document Filing System of the Southern District of Texas, thus providing service to all participants.

/s/ Kimberly Gdula
KIMBERLY GDULA
Assistant Attorney General